

**From:** "Randy Burleson"  
**To:** "Sue McConnell" <smcconnell@waterboards.ca.gov>  
**Date:** 4/1/2009 8:01 AM  
**Subject:** Gather the Previous Water Sampling Team for Discussion.  
**Attachments:** ole0.bmp

Ms. McConnell,

I'm not sure how sections of the County's aborted Rubicon Trail Master Plan (RTMP) wound up in the Administrative Record, but it is important to note that this document was withdrawn and not certified by El Dorado County - the very agency that was responsible for initiating and funding it. That's a clear statement on the County's lack of faith in this plan, and implicit commentary on the undue influence afforded to the anti-OHV activists bent on creating an impractical, unenforceable RTMP.

To be clear, the entire RTMP is not certified, it was only released as a DRAFT document. Public feedback was never completed - comments of experienced trail users and related experts were ignored and set aside, and the document has never had the benefit of a full draft, review, and revision cycle. It is neither fully released as an approved, agency document, nor is it even peer-reviewed or published as an academic study. As such, it is completely inappropriate to cite any section of the RTMP.

Certain elements of the Master Plan are worth commenting further, even in their diminished state as elements of an uncertified, unreviewed, unreleased assembly of opinions. The water sampling data that was developed for the Draft EIS may be worth a second look, but we need to get that team back together to ask some key questions about that data:

\* Why did we change sampling protocol half-way through the project?

\* Does sufficient water sampling exist to establish a true baseline?

\* Does sufficient soil sampling exist to establish a true baseline?

\* What were the details of the sampling location protocol? Were samples taken over a calculated, planned area, or were sampling locations elected on site as 'grab samples'?

\* Why did we select the testing protocol that we did, and did it exclude naturally occurring hydrocarbons?

Key personnel

\* Dr. Susan Crawford - chaired CREST and supervised the graduate students doing the work, can directly comment change in protocol

\* Ric Cuchetto - developed a great slide presentation based on the analytic chemistry side of the sampling that I viewed at an American River Watershed meeting.

The whole RTMP was set aside, uncertified, but certain components of the water testing might be revisited, requalified, and retained.

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Randy Burleson  
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